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Attorneys for Defendants  
AU Optronics Corporation and  
AU Optronics Corporation America

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL) ANTITRUST  
LITIGATION

Case No. 3:07-md-1827 SI  
MDL No. 1827

This document Related to  
Individual Case No. 3:10-cv-01064 SU

Case No. 3:10-cv-01064 SI

DELL INC. and DELL PRODUCTS L.P..

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
MOTIONS TO COMPEL**

## Plaintiffs.

V.

SHARP CORPORATION, *et al.*,

## Defendants

WHEREAS, AU Optronics Corporation and AU Optronics Corporation America (collectively, “AUO”) propounded its Second Set of Special Interrogatories and Second Set of Requests for Production of Documents on Dell, Inc. and Dell Products L.P. (collectively, “Dell”) (“AUO’s Settlement Discovery Requests”) on November 4, 2011;

WHEREAS, Dell responded to AUO's Settlement Discovery Requests on February 7, 2012;

1 WHEREAS, the Special Master in the MDL entered an Order re: Hannstar Display  
 2 Corporation's Motion to Compel Best Buy to Respond Further to Document Request No. 45 on  
 3 February 15, 2012 (Dkt. 4825) (the "Special Master's February 15, 2012 Order");

4 WHEREAS, the Special Master's February 15, 2012 Order addresses legal issues germane to  
 5 AUO's request that Dell supplement its responses to AUO's Settlement Discovery Requests;

6 WHEREAS, the Special Master granted a motion brought by Best Buy Direct Action Plaintiffs  
 7 and Samsung Defendants to stay the Special Master's February 15, 2012 Order until February 29, 2012;

8 WHEREAS, Best Buy and Samsung filed an Objection to the Special Master's February 15,  
 9 2012 Order on February 29, 2012 (Dkt. 4964) (the "Best Buy and Samsung Objection");

10 WHEREAS, the Best Buy and Samsung Objection is set for hearing before Judge Illston on  
 11 April 6, 2012;

12 WHEREAS, AUO's deadline to move to compel Dell to supplement its responses to AUO's  
 13 Settlement Discovery Requests is March 8, 2012;

14 WHEREAS, Dell and AUO would like to wait until the Best Buy and Samsung Objection is  
 15 resolved before beginning the meet and confer process regarding AUO's Settlement Discovery  
 16 Requests;

17 WHEREAS, Dell propounded its First Set of Requests for Admission to AUO Defendants  
 18 ("Dell's Requests for Admission") on November 4, 2011;

19 WHEREAS, AUO responded to Dell's Requests for Admission on February 6, 2012;

20 WHEREAS, Dell's objections to AUO's responses to Dell's Requests for Admission are based  
 21 in part on AUO's invocation of its employees' assertions of the Fifth Amendment;

22 WHEREAS, AUO's employees assertions of their Fifth Amendment rights could change after  
 23 judgment is entered in *United States v. AU Optronics, et al.*, Case # 3:09-cr-00110 (N.D. Cal.);

24 WHEREAS, Dell's deadline to move to compel AUO to supplement its responses to Dell's  
 25 Requests for Admission is March 7, 2012;

26  
 27 NOW, THEREFORE, AUO and Dell, through their undersigned respective counsel, stipulate  
 28 and agree as follows:

The deadline for AUO to move to compel Dell to supplement its responses to the AUO Settlement Discovery Requests shall be extended to fourteen days after the entry of an Order by Judge Illston regarding the Best Buy and Samsung Objection to the Special Master's February 15, 2012 Order.

The deadline for Dell to move to compel AUO to supplement its responses to Dell's Requests for Admission shall be extended to fourteen days after the entry of judgment in *United States v. AU Optronics, et al.*, Case # 3:09-cr-00110 (N.D. Cal.).

Dated: March 6, 2012

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By: \_\_\_\_\_ /s/ Debra D. Bernstein  
Debra D. Bernstein  
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Dated: March 6, 2012

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By: /s/ Carl L. Blumenstein  
Carl L. Blumenstein  
Attorneys for Defendants AU Optronics Corporation  
and AU Optronics Corporation America

Attestation: Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from each of the signatories.

## ORDER

IT IS SO ORDERED.

Dated: 3/8/12

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The Honorable Susan Illston  
Judge of the United States District Court